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FILED

[Signature] APR 04 2022

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CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 *Juana Lorena Hernández* Plaintiff,
11 vs.
12 *Archdiocese of San Francisco*
13 Defendant(s).
14
15 _____

AGT
CV22 02132
CASE NO.

EMPLOYMENT DISCRIMINATION
COMPLAINT

16 1. Plaintiff resides at:

17 Address 1295 45th Ave. Apt. 5

18 City, State & Zip Code San Francisco, CA 94122

19 Phone (415) 665-9587

20 2. Defendant is located at:

21 Address One Peter Yorke Way

22 City, State & Zip Code San Francisco, CA 94109

23 3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred on this Court by 42 U.S.C. Section 2000e-5. Equitable and other relief is sought under 42 U.S.C. Section 2000e-5(g).

24 4. The acts complained of in this suit concern:

25 a. Failure to employ me.

26 b. Termination of my employment.

- 1 c. Failure to promote me.
 2 d. Other acts as specified below.

3 Disparagement - treated differently on same position
 4 On March 8, 2019; Christine Escobar, Human
 5 Resources Manager, refused to fire me after filing a wage
 6 claim with the Department of Industrial Relations over a
 7 position I held within the Archdiocese; therefore, retaliated
 8 against me. Furthermore, before retaliation occurred, defendant failed
 9 to take all reasonable steps to prevent such retaliation from occurring.

5. Defendant's conduct is discriminatory with respect to the following:
- 10 a. My race or color.
 11 b. My religion.
 12 c. My sex.
 13 d. My national origin.
 14 e. Other as specified below.

Title VI

16. The basic facts surrounding my claim of discrimination are:

17 Christine Escobar, HR Manager at the Archdiocese of San Francisco
 18 denied me a job for which I fully qualified after filing a wage claim
 19 The actions of defendant's employees were caused by and were
 20 in retaliation for the protected activity I set forth in above.
 21 Hiring was denied after defendant's employee Christine Escobar
 22 became aware that I had filed a wage claim with the Labor Commissioner.
 23 Despite defendant's, actual or constructive, knowledge of the above-mentioned
 24 retaliation, and the knowledge of her supervisors and agents, defendant failed
 25 to take immediate and appropriate corrective action to stop the retaliation.

25. The alleged discrimination occurred on or about March 8, 2019.
 26 Furthermore, before the retaliation occurred, defendant failed to take all reasonable
 27 (DATE) steps to prevent such retaliation from occurring

27. I filed charges with the Federal Equal Employment Opportunity Commission (or the
 28 California Department of Fair Employment and Housing) regarding defendant's alleged

1 discriminatory conduct on or about 10/2019.

2 (DATE)

3 9. The Equal Employment Opportunity Commission issued a Notice-of-Right-to-Sue letter
4 (copy attached), which was received by me on or about April 5, 2021.

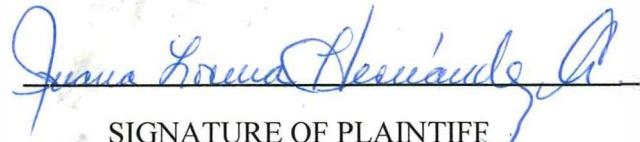
5 (DATE)

6 10. Plaintiff hereby demands a jury for all claims for which a jury is permitted:

7 Yes ✓ No _____

8 11. WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate,
9 including injunctive orders, damages, costs, and attorney fees.

10
11 DATED: April 4, 2022



12 SIGNATURE OF PLAINTIFF

13
14 (PLEASE NOTE: NOTARIZATION
15 IS NOT REQUIRED.)

Juana Lorena Hernandez

16 PLAINTIFF'S NAME

17 (Printed or Typed)

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